

## **Exhibit B**

### B GSE Group, LLC Plan Projection

#### Beginning Cash Balance

Professional Fee Carveouts	\$80,000
Excess Sale Proceeds Carveout	\$25,000
Net A/R Collections	\$295,000 (1) _____
	\$400,000
 Litigation Recoveries	 Unknown (2)

#### Expenses

Rent (3 months)	\$39,075
Insurance (3 months)	\$30,000
QB Fees (3 months)	\$1,125
Utilities (3 months)	\$8,700
Pre-Confirmation Professional Fees	\$130,000 _____
	\$208,900
 Post-Confirmation Professional Fees	 Unknown (3)

1. These funds have not been collected to date.
2. The Debtor's schedules list gross potential avoidance action claims against third parties of approximately \$3 million, and additional potential claims against insiders totaling approximately \$3.9 million. Recoveries from such causes of action will likely constitute the primary source of distributions to unsecured creditors. The Debtor is unable to reliably project the recoveries from these claims, as the potential defendants may have valid defenses, including, but not limited to, that the payments were made in the ordinary course of business or that the defendant(s) extended subsequent new value to the Debtor. Difficulty in collection with respect to judgments obtained may also render some potential claims impractical. However, the Plan provides for the appointment of an experienced bankruptcy litigator as a neutral Chief Restructuring Officer, who will be charged with investigating, and if advisable, causing the Reorganized Debtor to pursue any such claims against the appropriate parties.
3. The professional fees of the Chief Restructuring Officer, the Debtor's counsel, and such other professionals as are required for full administration of the bankruptcy estate are unknown. However, because he is not a bankruptcy trustee, the Chief Restructuring Officer will not receive a statutory commission based upon moneys disbursed to creditors over and above the applicable professional fees.